

**Exhibit C**

Debtor's April 25 Letter to the Court [ECF No. 58]

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LEO FOX, ESQ.

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April 25, 2022

**VIA ELECTRONIC FILING**

Honorable Sean H. Lane  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green  
New York, New York 10004-1408

Re: Hello Living Developer Nostrand LLC  
Case No. 21-22696 (SHL)

Dear Judge Lane:

I enclose copies of the Insurance Policies maintained by the subsidiary of the Debtor dated March 7, 2022 (Exhibit A) which lists the United States Trustee as a notice party and predecessor secured creditors with respect to the mortgage on the Real Property as additional insured. I was not in the office on Friday, April 22, 2022, because of the Jewish Holiday and advised counsel for the Mezz Lender of that fact which makes the six emails of April 22, 2022 to me and the email to this Court complaining about me even though we gave the Mezz Lender all that it wished in the Stipulation, surprising.

I also enclose copies of emails going back to March 3, 2022 and earlier (Exhibit B) between the Debtor's Insurance Agency and Stephanie from Madison Capital, the Mezz Lender's predecessor in interest dealing with the insurance renewals and the actual Insurance Certificates issued in early March 2022 insuring the Real Property owned by the subsidiary. Obviously, the predecessor insured and the existing insured were either not talking to each other or had not coordinated this insurance issue between them. Either this insurance issue was a manufactured scheme to schedule the Motion to Lift Stay earlier than previously stipulated to or the successor mortgagee was not complying with its obligations with respect to insurance. This Court can see from this instance that the secured lender's statements should always be accompanied with confirmation. We believe the new Lender is covered under the assignment of the original Secured Lender's position but we would be prepared to update the insured's name and address information when we receive it.

Honorable Sean H. Lane  
April 25, 2022  
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In this connection, Mezz Lender's email to this Court that I failed to respond to the comments to the Stipulation are untrue as evidenced by the attached emails reflecting my comments which they included in the Stipulation in spirit if not in substance that we had the right to object (Exhibit C).

As a consequence, we respectfully submit that the Stipulation that was negotiated between the Debtor and the Mezz Lender calling for a briefing schedule for all matters and set for a hearing on May 25, 2022 be adhered to and this last minute reversal should be rejected.

In addition, we have a request for a scheduling matter as well. As part of the Plan and Disclosure Statement, we would like to file an objection to the claims of the Mezz Lender to be heard on May 25, 2022. Normally the 30-day deadline under Bankruptcy Rule 3007 would be sufficient if we filed the objection today, something we could not do because of the Mezz Lender's actions. We respectfully request that the Court authorize a hearing on the Debtor's objections to the Mezz Lender's claim provided that the objections are filed by April 27, 2022.

Very truly yours,

/s/ Leo Fox  
Leo Fox

LF:cb  
Enclosures

cc: Tara Tiantian, United States Trustee  
Leo Muchnik, Esq.  
Alan Brody, Esq.